

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
:   
Kenneth M. Grose : No. 19-13071-AMC  
Natonda Grose :   
Debtors :

ANSWER TO MOTION OF U.S. BANK NATIONAL ASSOCIATION  
FOR RELIEF FROM THE AUTOMATIC STAY

Debtors, by Attorney David M. Offen respectfully submit the following:

Debtors admit that some payments have been missed but deny the total amount that Movant is claiming. Debtors will provide all proofs of payments made and request Movant to work with them for the chance to clean up the arrears. The debtors are also interested in a Loan Modification and ask for the chance to apply to the same.

WHEREFORE, the Debtors respectfully request that the Movant's Motion for Relief be DENIED.

Respectfully submitted,

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 8/13/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of US Bank National Association

[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 8/13/20